

ISSUE 1: Public Health Attribution and Volume

1. What recommendation does the committee have regarding enhancing methodology and data sources used by FSIS to calculate and use public health attribution?

To be sure FSIS actions contribute to reducing food borne illness, the Committee recommends that, before moving ahead on the new inspection system, FSIS acquire more robust data on the relationship between specific foods and illnesses attributed to particular pathogens.

FSIS should have sufficient data on *campylobacter* to establish a performance standard. The agency should consult with CDC on the best way to factor into the database the impact of sporadic illness. Salmonella serotype information should be factored in as well, as should sporadic cases of other pathogens.

The subcommittee believes FSIS should not refer to the programs in development as risk-based or public health based until it has more robust data, including a true national prevalence number ,as well as enumeration and serotype information.

The agency should ask NACMCF for assistance in establishing appropriate data to be used and ways to avoid methodological problems in using limited data to develop the inspection levels.

The subcommittee strongly recommends the inclusion of serotype data in the data analysis and how it relates to public health.

The committee encourages FSIS to evaluate the utility of more contemporary microbiological technologies in Agency testing and for foodborne attribution. FSIS should use the most current validated methodologies and work with USDA ARS, other public health agencies, universities, schools of public health etc., to look at new methodologies. The committee would be interested in hearing updates of Agency's progress on new methodologies and especially on the ARS meeting scheduled for March.

2. What recommendation does the committee have regarding how to better use volume for ranking establishments within the second level of inspection in the Public Health Risk-Based Inspection System?

FSIS should differentiate product destined for fully cooked product separate from raw product volume.

FSIS should use pounds of product shipped, not pounds of product produced. Consumer is not exposed to pounds of product produced if some of the produced product is held.

FSIS needs to consider the fluctuation of production volume due to seasonality.

FSIS should review issues discussed regarding volume at the last advisory committee meeting.

